

**COMMONWEALTH OF MASSACHUSETTS**  
**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. 01-34

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: February 15, 2002

VZ-ATT 2-1: On page 4 of the Direct Testimony of Eileen Halloran, it states that “in the overwhelming majority of situations Verizon is the only source for these [special access] facilities. Please explain fully the basis for your statement, as it relates specifically to Massachusetts. Also please provide all documents and identify all specific facts upon which you relied in support of your statement for Massachusetts.

Respondent: E. Halloran

RESPONSE: I made this statement based on the testimony submitted by Anthony Fea in D.T.E. 01-31 and on the Declaration of Anthony Fea and William J. Taggart III filed with the FCC.

Mr. Fea’s D.T.E. 01-31 testimony explains the difficulty AT&T faces in obtaining facilities-based alternatives to Verizon for the services AT&T provides to its customers, including services provided via special access circuits. Mr. Fea’s testimony addresses AT&T’s challenges in building the connectivity between the end-user customer and the network, and AT&T’s resulting need to rely on Verizon. On page 9 of the testimony, Mr. Fea provides the percent of AT&T customers served using a “Type II” arrangement – defined as the use of equipment and facilities leased from another carrier, usually Verizon.

Similarly, the Fea/Taggart Declaration submitted to the FCC demonstrates that capacity from self-supply or alternative providers outside the ILEC network is only available in relatively rare circumstances and that, in the vast majority of cases, CLECs have no choice but to lease the facilities of the ILEC in order to provide special access service.

Attached to this response are the non-proprietary versions of Mr. Fea’s D.T.E. 01-31 testimony and the Declaration of Mr. Fea and Mr. Taggart

submitted to the FCC. The proprietary version of Mr. Fea's D.T.E. 01-31 testimony will be provided to the Department.

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VZ-ATT 2-2: On page 4 of the Direct Testimony of Eileen Halloran, it states that “[s]pecial access services from other sources (competitive access providers or other CLECs) are only available in limited circumstances.” Please explain fully the basis for your statement, as it relates specifically to Massachusetts. Also please provide all documents and identify all specific facts upon which you relied in support of your statement for Massachusetts.

Respondent: E. Halloran

RESPONSE: Please see the response and attachments to VZ-ATT 2-1.

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VZ-ATT 2-3: On page 8 of the Direct Testimony of Eileen Halloran, it states that “[t]he disparity between Verizon ‘s provisioning and maintenance to its retail customers and to its wholesale customers is repeated and systematic.” Please explain fully the basis for your statement, as it relates specifically to Massachusetts. Also please provide all documents and identify all specific facts upon which you relied in support of your statement for Massachusetts.

Respondent: E. Halloran

RESPONSE: The basis for this statement is the data provided by Verizon in this proceeding and the calculations done by me using this Verizon data as described my direct testimony.

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VZ-ATT 2-4: On page 10 of the Direct Testimony of Eileen Halloran, it states that “[t]he experiences of AT&T customers per the feedback from AT&T salespeople confirm these percentages.” Please identify the particular percentages to which you refer and explain fully the basis for your statement, as it relates specifically to Massachusetts. Also please provide all documents and identify all specific facts upon which you relied in support of your statement for Massachusetts.

Respondent: E. Halloran

RESPONSE: The on-time performance percentages computed from Verizon’s data and presented in my testimony are confirmed by the experiences of AT&T customers.

My statement about customer experience is based on my discussions with AT&T customers and Verizon personnel. In one incident that occurred in Woburn, Massachusetts, AT&T received a long interval from Verizon due to fiber construction. When the customer went directly to Verizon, the customer received a shorter interval. Based on my conversations with Nancy McFeeley, the Vice President of Operations, Verizon gave the customer a better interval because the Verizon retail agent was able to override the Verizon engineering inventory restriction that was driving orders to fiber instead of using available copper.

The poor Verizon on-time percentages are also confirmed by the experiences of WorldCom customers as demonstrated in the Declaration of Eric Gillenwater submitted as an attachment to the testimony of Karen Furbish.

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VZ-ATT 2-5: Referring to page 13 of the Direct Testimony of Eileen Halloran, please identify the states included in "Verizon North," as it relates to AT&T's experience with "special access DS1 on-time provisioning performance for AT&T in Verizon North." Please explain fully the basis for your statement that Verizon North's performance is "worse than the performance for AT&T for any other ILEC." Also please provide all documents and identify all specific facts upon which you relied in support of your statement, as it relates to Verizon North and as it relates to Massachusetts individually.

Respondent: E. Halloran

RESPONSE: The Verizon North states to which I refer are the former NYNEX states.

My statement that "AT&T's experience that the special access DS1 on-time provisioning performance for AT&T in Verizon North is worse than the performance for AT&T in any other part of Verizon and worse than the performance for AT&T by any other ILEC" is based on my review of ILEC self-reported performance data. This data provides the results for on-time provisioning to customer desired due date ("CDDD"), firm order commitment ("FOC") on time, failure frequency, time to restore, and many other metrics.